

September 21, 2012

Mr. Ray Allshouse, Chair Washington State Building Code Council PO Box 41449 Olympia, WA 98504-1449

Mr. Chairman and Council Members:

I am Phil Bonnell, Regional Vice President and General Manager of Basalite Concrete Products, a manufacturer of concrete block and bagged concrete products. One of our production facilities is in DuPont, WA and therefore the requirements of the Washington State Energy Code impact our business which is already suffering in this slow construction economy.

I support the testimony of the Northwest Concrete Masonry Association regarding the commercial mass wall energy code requirements. This specifically includes supporting Option 2 for both Table C402.1.2 and Table C402.2, opaque thermal envelope requirements. I am strongly opposed to proposed Option 1 for the following reasons:

- 1. It lowers the nonresidential mass wall U-factor requirement from the current Washington State Energy Code by a drastic 48% in one code cycle. I want to point out that Option 2 lowers it as well, but a more reasonable 30%.
- 2. Option 1 increases the continuous insulation R-value requirement by 100% in one code cycle. This is far from an incremental change.
- 3. Option 1 increases masonry wall costs by 30-40% or even more (depending upon the durability requirements of the wall interior surface), yet it only provides a small savings in energy costs for many typical masonry building types in the moderate Western Washington climate.
- 4. The simple payback period for building owners required to comply with Option 1 is well beyond the life of their building. This is clearly not a cost-effective option.

It is clear that Option 1 would disadvantage the concrete/masonry industry without adequate justification. Locally produced masonry materials will likely be replaced with less durable construction materials shipped from outside the state of even outside the country. This is not good sustainable design practice either. Concrete masonry walls are multi-functional allowing less construction materials to be used. Block walls can serve as structural support, building enclosure, interior/exterior finish and fire-rated assemblies. They are extremely durable and long lasting which are key components of good sustainable design. Option 2 makes the state energy code more stringent and lowers the mass wall assembly U-factor requirement from the current value of 0.15 to 0.104 (a 30% reduction). This is a significant change in one code cycle, especially when considering small business impacts and the current state of our economy. It is an incremental change and represents a compromise approach between the IECC provisions and the WA state energy code. This same value is found in ASHRAE 90.1 for our climate zone. We urge the Council to support Option 2 for both of the commercial thermal envelope tables referenced.

The opportunity to comment today is appreciated.

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